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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 IN RE: TFT-LCD (FLAT PANEL)
12 ANTITRUST LITIGATION

Master File No. M07-1827 SI

MDL No. 1827

13 This Document Relates to:

14 ALL ACTIONS
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**[PROPOSED] AMENDED ORDER
REGARDING THE TAKING OF
DEPOSITIONS AT THE UNITED
STATES EMBASSY IN TOKYO, JAPAN
AND AT THE UNITED STATES
CONSULATE GENERAL IN OSAKA,
JAPAN**

The Honorable Susan Illston

1 **TO ANY CONSUL OR VICE-CONSUL OF THE UNITED STATES ASSIGNED TO**
2 **TOKYO AND OSAKA, JAPAN:**

3 WHEREAS the above-captioned coordinated class action proceeding has been pending
4 before this Court since July 2007;

5 WHEREAS the Plaintiffs allege antitrust violations by Defendants, manufacturers of Thin-
6 Film Transistor Liquid Crystal Display (TFT-LCD) products;

7 WHEREAS full discovery began in January 2009;

8 WHEREAS the Parties reserved a deposition room at the United States Embassy in Tokyo,
9 Japan and a deposition room at the United States Consulate General in Osaka, Japan, respectively,
10 for taking depositions from November 8 through November 19, 2010;

11 WHEREAS the Court previously entered versions of this Order on October, 2010
12 (Docket No. 2085) and November 2, 2010 (Docket No. 2111);

13 WHEREAS the Court is informed that one of the attorneys listed in the November 2, 2010
14 Order is not traveling to Japan as previously anticipated, necessitating amendment of said Order to
15 accurately reflect the names of attorneys seeking deposition visas, in accordance with protocol;

16 THEREFORE, the Court enters the following amended version of its Order authorizing the
17 taking of depositions in Japan and directing consular personnel to approve and process the
18 deposition visas of all attorneys listed herein.

19 On stipulation of the Parties, and pursuant to Article 17 of The United States-Japan
20 Consular Convention of 1963, 15 U.S.T. 768,

21 **IT IS ORDERED** that the depositions of the following witnesses, who will appear
22 voluntarily, be taken at the United States Embassy in Tokyo, Japan:

23 Name: Kazuo Hatanaka
24 Employer: Hitachi Displays, Ltd.
Address: 3300 Hayano Mobara-shi, Chiba-ken, 297-8622, Japan

25 Name: Tomohito Amano
26 Employer: Toshiba Mobile Display Co., Ltd.
Address: 1-9-2, Hatara-cho, Fukaya-shi, Saitama, 366-0032, Japan

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1 Name: Makoto Chiba
2 Employer: Toshiba Mobile Display Co., Ltd.
3 Address: 1-9-2, Hatara-cho, Fukaya-shi, Saitama, 366-0032, Japan

4 Name: Kazuyoshi Nakayama
5 Employer: Sharp Corporation
6 Address: 22-22, Nagaike-cho, Abeno-ku Osaka, 545-8522, Japan

7 Name: Noboru Yamazawa
8 Employer: Sharp Corporation
9 Address: 22-22, Nagaike-cho, Abeno-ku Osaka, 545-8522, Japan

10 Depositions of the above individuals will commence on or about November 15, 2010 at
11 9:00 a.m.(local time) and conclude on or about November 19, 2010 at 5:00 p.m. (local time).

12 **IT IS ORDERED** that the deposition of the following witness, who will appear
13 voluntarily, be taken at the United States Consulate General in Osaka, Japan:

14 Name: Toshihiko Hirobe
15 Employer: Sharp Corporation
16 Address: 22-22, Nagaike-cho, Abeno-ku Osaka, 545-8522, Japan

17 Deposition of the above individual will commence on or about November 10, 2010 at 9:00
18 a.m. (local time) and conclude on or about November 12, 2010 at 5:00 p.m. (local time).


19 Counsel for Plaintiffs who will participate in the said depositions include one or more of the
20 following: Debra Bernstein, Qianwei Fu, Rodney Ganske, Brendan Glackin, Jessica L. Grant,
21 Steven Greenfogel, Astor Heaven, Derek G. Howard, Elizabeth Jordan, Michael Kenny, Matthew
22 Kent, Matthew McBurney, Gary D. McCallister, Robert McNary, Brian Parker Miller, Jerome
23 Murphy, Joseph R. Saveri, Thomas Simek, Joshua Stokes, Andrew Tuck and Valarie Williams.

24 Counsel for Defendants who will participate in said depositions include one or more of the
25 following: Christopher A. Nedeau, Patrick Ahern, Hugh Bangasser, Laura Grossfield Birger,
26 Luisa Cetina, John Chung, Christopher Curran, Allison A. Davis, Amanda Devereux, Ramona
27 Emerson, Patrick Eysers, Stephen P. Freccero, Elizabeth Haley, Tetsuhiro Horiuchi, Tsuyoshi
28 Ikeda, Aya Kobori, Jack W. London, Aaron Marcu, Kristen McAhren, Leigh McMullan, Fusae
Nara, Sean O'Shea, Gordon Pearson, Kent M. Roger, William Schwartz, Jacob R. Sorensen, Mark
Ressler, Martin Toto, Tomihisa Ueda, Manao Yamaguchi, and Kimberly Zelnick.

1 The proceedings will be reported by Balinda Jean Dunlap or James Vernon Beasley and
2 recorded on video by Michael Angel Barber or Frank Thomas Clare. The proceedings will be
3 interpreted by Grace Liu, William Lise, or Bruce Holcombe. The transcript of the depositions will
4 be prepared and distributed among the interested parties by the court reporter without further
5 involvement by the Embassy and the Consulate General.

6 **IT IS SO ORDERED.**

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8 Dated: 11/5/10


HONORABLE SUSAN ILLSTON
United States District Judge